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Mr. David L. Priester
Standardization Section
Fresh Products Branch
Fruit & Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Room 1661 South Building, Stop 0240
Washington, D.C. 20250-0240

Dear Mr. Priester:

**Re: United States Standards for Grades of Pea Pods
Docket #FV-05-308**

Western Growers is an agricultural trade association whose 3,000 members grow, pack and ship 90% of the fresh vegetables and nearly 70% of the fresh fruits and nuts grown in Arizona and California, which amounts for over one half of the nation's fresh produce produced.

It is on behalf of those members that I am submitting these comments to ascertain if there is a need for a new standard to be developed for Pea Pods. As it relates to sections pertaining to grades, tolerances, application of tolerances, pack requirements, definitions, and other relevant and necessary provisions of any potentially developed grade for Pea Pods.

Western Growers Association surveyed its members who grow, pack, or ship pea pods soliciting their input on the possibility of developing standards for pea pods and the possible impact on distributors, processors and growers.

After reviewing their comments, there was a clear consensus to support the development of standards for pea pods.

Our members also wish that if a new standard for Pea Pods is going to be developed that they would like to participate in any discussions in the developing of this new standard. They are also anxious to see comments from other industry members on this subject which would help them in participating in future discussions.

Western Growers also wishes to be a major participant in developing this standard should it be determined one needs to be developed. Please let me know if there is anything further I can provide for your review.

Very truly yours,


THOMAS R. OLIVERI
Director, Trade Practices & Commodity Services

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